Kaufman Dolowich Voluck, LLP 135 Crossways Park Drive, Suite 201 Woodbury, NY 11797 (516) 681-1100 Fax (516) 681-1101

Deeran Arabian
Deenora Corp. dba Dee's

February 16, 2021

RE: Deenora Corp. dba Dee's-Panora

BILLING SUMMARY THROUGH JANUARY 31, 2021

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<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Hours</u>	Amount
01/07/21	ASO	Calls with client regarding collective violations by Troy. Analysis of collective materials sent by Troy. Conference with team to find strategies to address violations. Strategize to consider potential sanctions for violation. Correspond with Troy's office regarding collective notice violations.	2.40	\$1,080.00
01/07/21	KG	Conference to strategize next steps in light of questionable conduct about Troy's notice process	0.60	\$270.00
01/07/21	TAA	Perform legal research regarding promotion letter in support of motion for sanctions based on dissemination of improper and misleading notice	3.40	\$1,088.00
01/07/21	TAA	Review and analysis of emails from Troy attempting to explain notice violations	0.40	\$128.00
01/08/21	ASO	Further calls with Dee regarding sanctions motion.	0.20	\$90.00
01/08/21	ASO	Revision of draft motion to Court regarding collective notice malfeasance by Troy.	1.80	\$810.00
01/08/21	KG	Review applicable case law about sanctions for opposing counsel due to FLSA notice misconduct	0.40	\$180.00
01/08/21	KG	Revise letter to court about sanctions	0.40	\$180.00
01/08/21	TAA	Draft letter in support of motion for sanctions and decertification	5.70	\$1,824.00
01/08/21	TAA	Finalize letter in support of motion for sanctions and decertification	0.50	\$160.00
01/08/21	TAF	Examine and analyze relevant authority regarding sanctions for improper notice and documents in other cases being handled by opposing counsel.	0.40	\$128.00
01/11/21	KG	Review and analyze court scheduling order regarding sanctions hearing	0.20	\$90.00
01/11/21	TAA	Review and analysis of briefing schedule entered by court with regard to sanctions motion	0.10	\$32.00

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<u>Date</u>	Atty	<u>Description</u>	Hours	Amount
01/15/21	TAA	Review and analysis of Troy response to motion for sanctions	1.40	\$448.00
01/16/21	KG	Review and analyze plaintiff's opposition to Defendant's application seeking sanctions for improper notice communications	0.50	\$225.00
01/19/21	ASO	Examination and analysis of Troy's response to sanctions motion. Preparation of detailed outline for oral argument. Conduct associated research.	3.40	\$1,530.00
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01/19/21	KG	Review and revise outline for sanctions arguments in advance of court appearance	0.50	\$225.00
01/19/21	TAA	Analysis of potential arguments in preparation for oral argument on motion for sanctions	2.30	\$736.00
01/20/21	ASO	Further preparation for oral argument (including prep call with client for oral argument) and conduct oral argument.	2.10	\$945.00

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<u>Date</u> <u>Atty</u> <u>Description</u> <u>Hours</u> <u>Amount</u>

Total Hours and Fees

Attorney		Hours	Rate	Amount
Aaron Solomon	Partner		\$450.00	
Keith Gutstein	Partner		\$450.00	
Guilia Escobar	Associate		\$320.00	
Taimur Alamgir	Associate		\$320.00	
Taylor Ferris	Associate		\$320.00	
				

Total Current Fees